

HEUSSER MÖUNTAIN BRISTLECONE PINE NATURAL AREA

NEVADA BLM WILDERNESS REPORT APRIL 1981



UNITED STATES

DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

NEVADA STATE OFFICE



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WILDERNESS REPORT

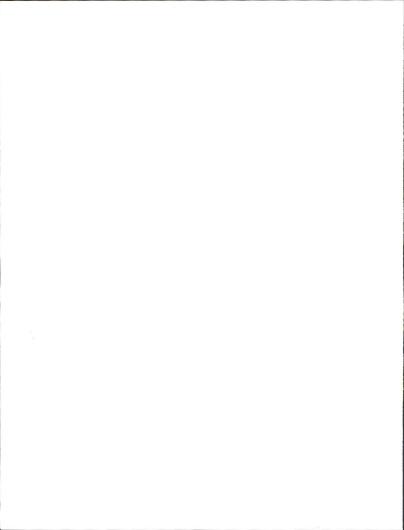
Heusser Mountain Bristlecone Pine
Natural Area

Bureau of Land Management Department of the Interior

April 1981

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I. RECOMMENDATION

The Heusser Mountain Bristlecone Pine Natural Area was inventoried and found to lack wilderness characteristics when considered by itself. A wilderness suitability recommendation was deferred until the Natural Area could be intensively inventoried along with its contiguous roadless lands, wilderness review unit NV-040-048 A (Heusser Mountain). On November 7, 1980, a final inventory decision was issued by the Nevada State Director that unit NV-040-048 A is without wilderness characteristics, and the unit was dropped from further wilderness consideration. This decision was unprotested. Consistent with these findings, it is now recommended that the Natural Area is unsuitable for wilderness designation because it lacks wilderness characteristics, both when considered alone and when considered with its contiguous roadless lands. When considered by itself, the Natural Area fails to meet the size criterion (its size is only 480 acres) and the criterion requiring outstanding opportunities for either solitude or for primitive and unconfined recreation. When considered in combination with its contiguous readless lands, the Natural Area has sufficient size but still lacks outstanding opportunities for solitude or for primitive and unconfined recreation.

There will be few or no negative economic and social impacts resulting from adoption of this recommendation. This is essentially a "no-action" proposal that would result in maintenance of the present situation. If the recommendation is adopted, the Designated Natural Area will continue to carry its present designation, and currently applicable regulations and management restrictions (except for the Interim Management Policy and Guidelines for Lands Under Wilderness Review) will continue in force. The only negative economic result will be the possible loss of opportunity for economic gain that would result from increased visitation of the area if it were to receive official wilderness designation. Because of a marked lack of research in this field, these economic impacts are not measurable. An inferential conclusion might be drawn, however, that little economic gain will be forgone since several other areas of potential wilderness exist in the general area. (These units include BLM wilderness study areas NV-040-015, NV-040-086, NV-040-168, NV-040-169, and NV-040-172, and USFS units FS-4-352, FS-4-359, and FS-4-391). Some positive economic results may be realized from adoption of the recommendation by allowing economic exploitation of the area in ways which otherwise would be prohibited because of their conflict with wilderness management objectives. For instance, the "cove" area of unit NV-040-048A is a prime area for greenwood cutting and for Christmas trees, and this resource can only be exploited once the interim wilderness regulations have been lifted. (Economic exploitation of the Natural Area itself is economically inpossible because of its location).

Negative social impacts should be small or nonexistent for the same reasons that no negative economic impacts will be created. The Natural Area will continue under its current designation, and other areas of potential wilderness are located in the same vicinity and will compensate for any loss due to an unsuitable recommendation. A net positive social impact may result since the

attitudes of the local population oppose increased governmental regulation, and only mildly support expansion of the recreation industry while strongly supporting expansion of mining and agriculture.

Because the Heusser Mountain Bristlecone Pine Natural Area has been found to lack wilderness characteristics, both when considered alone and when considered with its contiguous natural lands, it is now recommended that it is unsuitable for wilderness designation.

Med B. mc Clary
District Manager

Slavarf J. Spang
State Director

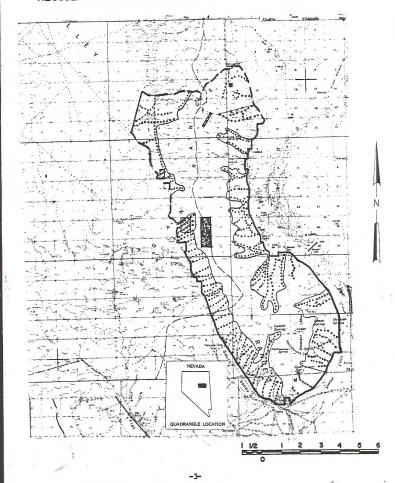
3/26/81 Date

Date Date

Director

Date

HEUSSER MOUNTAIN BRISTLECONE PINE NATURAL AREA



LEGEND REVIEW AREA BOUNDARY

FENCE

SPRING:

BUILDING

CAVE

CAMP

DUMP

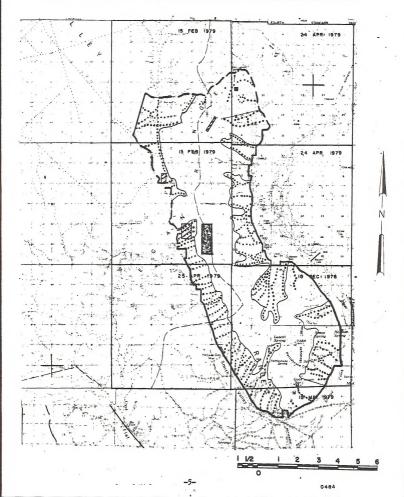
CORRAL

INTENSIVE INVENTORY BOUNDARY NATURAL PORTION BOUNDARY TRANSPORTATION PLAN ROAD DOCUMENTED ROAD FOREST SERVICE BOUNDARY REVIEW AREA FEATURES NON-FEDERAL LANDS PROPOSED STUDY AREA PHOTO AND DIRECTION POWER OR COMMUNICATION LINE DESIGNATED NATURAL AREA RAILROAD CATTLEGUARD \equiv CEMETERY + IMPROVED 0)+ UNIMPROVED \rightarrow RESERVOIR Ø, PIPELINE OR CONDUIT CANAL OR DITCH ŏ ARTESIAN WELL WINDMILL OR WELL & TROUGH Ă STORAGE TANK LAND TREATMENT MINE(S) OR QUARRY(S) OR MINING CLAIM(S) SEISMOGRAPH STATION RADIO INSTALLATION FOREST SERVICE RARE II BOUNDARY montantinin NATIONAL REGISTER OF HISTORIC PLACES BOUNDARY С DOCUMENTED ROAD UNREVIEWED ROUTE Δ

2

D

HEUSSER MOUNTAIN BRISTLECONE PINE NATURAL AREA



HEUSSER MOUNTAIN BRISTLECONE PINE NATURAL AREA

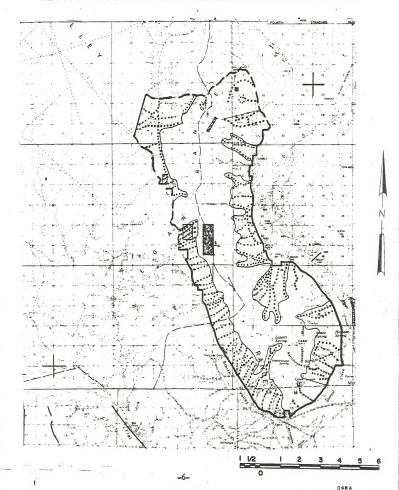




Photo #1 Looking southeast from the Natural Area down into the contiguous lands.



Photo #2 Looking north into the Natural Area.

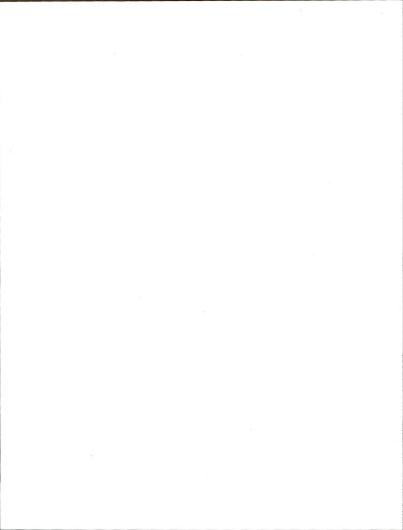




Photo #3 Looking northwest into the Natural Area.



III. STATISTICAL SUMMARY

<u>Heusser Mountain Bristlecone Pine</u> Natural Area

White Pine County Ely District

Acres Without	Previously Designated Area	Contiguous Lands	Total
Wilderness Characteristics	480	52,720	53,200
Acres with Wilderness Characteristics	0.1		
Recommended			
For Designation	0	0	0
Recommended			
Against Designation	0	0	0
<u>Total</u>	480	52,720	53,200
Ownership in Study Area (12/10/7	6)		
BLM	480	52,280	52,760
Private	0	440	440

IV. BACKGROUND INFORMATION

A. PREVIOUS DESIGNATION

The Heusser Mountain Bristlecone Pine area was made a Designated Natural Area on February 4, 1965. This designation segregates the Natural Area from "all forms of appropriation under the public land laws, including the mining laws (Ch. 2, Title 30 U.S.C.), but not from leasing under the mineral leasing laws for the protection of unique botanical. . . characteristics and of irreplaceable scientific and recreation values." (Federal Register, vol. 30, Feb. 4, 1965, pp. 1193-1194).

B. SIGNIFICANT RESOURCE DATA

The Heusser Mountain Bristlecone Pine Natural Area sustains a moderate cover of bristlecone pine. This tree is one of the longest living life forms on earth, but is not particularly unusual and is not rare or endangered.

C. DESCRIPTION OF REPORT AREA

The Heusser Mountain Bristlecone Pine Natural Area is located high on the steep western slopes of the Egan Range. Access is made extremely difficult by this location. The topography of the Designated Natural Area itself is steeply inclined but is not particularly rugged. Vegetation consists mostly of a moderate cover of bristlecone pines. The Natural Area is completely free of the imprints of man's work.

Most of the roadless lands contiguous to the Designated Natural Area which are in a generally natural condition are mountainous lands and benchland. Some of the surrounding valley land is also contiguous and roadless, but most of this is in an unnatural condition.

The Designated Natural Area is located in the Ely District's Cherry Creek Planning Unit, which is over 2 million acres in size. The recreation industry is a minor component of the economy of the planning unit. Using recent figures and formulas, it is estimated that 15 persons (.45 percent of the employable workforce) earn their incomes directly from expenditures for recreational activities on National Resource Lands, and 52 persons are economically dependent on this segment of the industry. (Figures provided by Marica D. Hayes, BLM Economist, Ely, Nevada).

The local population values the unrestricted and natural character of the land, but holds attitudes that generally oppose regulation and support economic development. In a survey of the White Pine County population (which includes the Cherry Creek Planning Unit), 41 percent of the respondants stated that they most valued the "open space/sparse population/peace and quiet" of the state. Ninety-two percent of those responding to the poll indicated that they opposed increased Federal regulation. Bighty-six percent believe that economic growth is beneficial, and 71

percent desire growth at a moderate rate. Only 5 percent would most like to see the recreation industry expand, as opposed to 20 percent who would most like to see agricultural expansion and 25 percent who desire expansion of the mining industry. (Figures taken from "Fact Sheet: Analysis of Survey Results," The Governor's Commission on the Future of Nevada, March 31, 1980;

D. SUMMARY OF PUBLIC PARTICIPATION

1. Description of process

On January 14, 1980, a public workshop was held in the Ely District Office to discuss the preliminary reports on the Instant Study Areas in the Ely District. There was no attendance. On April 17, 1980, a public workshop was held in the Ely Convention Center to discuss the intensive inventory recommendations. Six persons attended, and no mention was made of the Heusser Mountain Bristlecone Pine Natural Area. During the public comment period held after release of the intensive inventory recommendations, several written comments were received that mentioned the Natural Area and/or intensive inventory unit NV-040-048A. No protests were received when the decision to drop the area from further consideration became final in November, 1980.

2. Summary of analysis of comments received

Several of the comments received supported the recommendation to drop the area from further consideration. Other comments questioned the BLM's inventory findings, and asserted that the area offered outstanding opportunities for solitude or for primitive recreation. Still other comments offered information that had no bearing on the qualifications of the area for wilderness study area status. The conclusion drawn after analysis of these comments was that no new information had been provided, and that the original recommendation should become final.

V. APPENDIX

WILDERNESS INVENTORY WILDERNESS SUMMARY SHEET

I.	LOCATION
	Inventory Unit No.: NV-040-048A (DNA)
	Area Name: Heusser Mountain Bristlecone Pine Natural Area
	District: Ely State: Nevada
II.	SUMMARY
	Results of wilderness characteristics analysis.
	1. Does the Designated Natural Area appear natural? X Yes No
	 Does the Designated Natural Area offer out- standing opportunities for solitude or a primitive and unconfined type of recreation? Yes X No
	3. Does the Designated Natural Area meet any of the size requirements? Yes X No
	4. Does the Designated Natural Area have supplemental values? Yes X No
III.	RECOMMENDATION
	Designated Natural Area should be approved as a WSA.
	Z Designated Natural Area does not qualify by itself as a WSA, but may qualify when considered with contiguous roadless lands. Final decision is deferred until an intensive inventory has been made of the contiguous roadless lands.
	Designated Natural Area does not qualify as a WSA, either alone or when considered with contiguous roadless lands.
IV.	APPROVAL
Di	Mul B. mc Clery 2/1/80 Trict Manager Date
St	to pull and 3/7/80 Date

UNIT NUMBER: NV-040-048A UNIT NAME: Heusser Mountain

AREA DESCRIPTION: The Heusser Mountain review area is a long, narrow portion of the Egan Range. Its highest point is Heusser Mountain, which is in the southern portion of the area and is 9,411 feet tail. The review area is of a single, ridgeline character, with very steep slopes. Ranching use occurs on the foothills of both the east and west slopes. The Heusser Mountain Bristlecone Pine Natural Area (480 acres) is located within this unit.

CHARACTERISTICS INVENTORIED:

- 1. Size: The unit contains 32,940 acres of public land.
- Naturalness: Only a few intrusions exist within the unit and all of these make parts of the unit substantially unnatural. A remaining 24,400 acre portion is entirely natural.
- 3. Outstanding Opportunities for:
 - A. Solitude: Although the unit is of a fair size, its narrow configuration and the necessity of traveling along the ridgeline where vegetative screening is sparse means that opportunities for solitude are poor.
 - B. A Primitive and Unconfined Type of Recreation: There is a good, but not outstanding, diversity of recreation opportunities in the review area. The quality of each type of opportunity is less than outstanding, and is further lessened by the periodic occurrence of heavy smog from the McGill smelter.
- Supplemental Values: No ecological, geological, or other features of scientific, educational, scenic, or historical values were noted in the unit, other than the Natural Area and associated Bristlecone Pines.

RECOMMENDATION:

Zero acres are recommended for Wilderness Study Area status.

32,940 acres should be dropped from further wilderness consideration.

RATIONALE FOR RECOMMENDATION: Although a portion of the unit contains more than 5,000 acres of contiguous public land that generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable, neither outstanding opportunities for solitude nor a primitive and unconfined type of recreation are present.

FINAL INTENSIVE INVENTORY SUMMARY PUBLISHED NOVEMBER, 1980

UNIT NUMBER: NV-040-048A

UNIT NAME: Heusser Mountain

AREA DESCRIPTION: The Heusser Mountain unit is a long, narrow portion of the Egan Range. Its highest point is Heusser Mountain, which is in the southern portion of the area and is 9,411 feet tall. The unit is of a single, ridgeline character, with very steep slopes. Ranching use occurs on the foothills of both the east and west slopes. The Heusser Mountain Bristlecone Pine Natural Area (480 acres) is within this unit.

CHARACTERISTICS INVENTORIED:

- 1. Size: The unit contains 32.940 acres of public land.
- 2. Naturalness: Only a few intrusions exist within the unit and all of these make parts of the unit substantially unnatural. A remaining 24,400 acre portion is entirely natural.
- Outstanding Opportunities for:
 - A. Solitude: Although the unit is of a fair size, its narrow configuration and the necessity of traveling along the ridgeline where vegetative screening is sparse means that opportunities for solitude are poor.
 - B. A Primitive and Unconfined Type of Recreation: There is a good, but not outstanding, diversity of recreation opportunities in the review area. The quality of each type of opportunity is less than outstanding, and is further lessened by the periodic occurrence of heavy smog from the McGill smelter.
- Supplemental Values: No ecological, geological, or other features of scientific, educational, scenic, or historical value were noted in the unit, other than the Natural Area and associated bristlecone pines.

ORIGINAL RECOMMENDATION:

Zero acres are recommended for Wilderness Study Area status.

32,940 acres should be dropped from further wilderness consideration.

SUMMARY OF PUBLIC COMMENTS: BLM received 11 specific comments on this unit. Most comments mentioned natural condition and outstanding opportunities. Some comments cited intrusions and lack of solitude. One comment stated the unit lacks wilderness criteria. Several noted supplemental values and two listed other resource values. Also received were 2,326 general comments stating the unit meets the wilderness criteria.

FINAL DECISION:

Zero acres are designated as a Wilderness Study Area.

32.940 acres are dropped from further wilderness consideration.

RATIONALE FOR DECISION: Even though comments were received both supporting and opposing WSA designation, the evidence available to the Bureau indicates the area does not possess the necessary criteria for WSA designation.

WILDERNESS INTENSIVE INVENTORY

I. SIZE

Narrative:

The size of the Heusser Mountain Bristlecone Pine Natural Area is 480 acres. All 480 acres are unspoiled by the imprint of man's work. Because of the small acreage, the Natural Area does not meet the size requirement for wilderness set by the Wilderness Act.

SUMMARY: Does the Designated Natural Area have at least 5000 acres of contiguous land?

Yes X No

II. NATURALNESS

Narrative:

The Designated Natural Area is in an entirely natural condition, where the imprint of man's work is unnoticeable. Most of the Designated Natural Area is located on the side of a steep, forested mountain where Bristlecone Pine is the dominant vegetation. There are no intrusions in the area.

SUMMARY: Does the Designated Natural Area generally appear to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable?

X Yes No

III. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR PRIMITIVE AND UN-CONFINED RECREATION ANALYSIS

A. SOLITUDE

- SIZE: The 480 acre size of the Designated Natural Area severely limits the opportunities for solitude.
- CONFIGURATION: The narrow rectangular configuration (½ mile x 1½ miles) of the Designated Natural Area further limits the opportunities for solitude.
- SCREENING: The topography of the Designated Natural Area offers little screening from other users within the area. The overall contribution of topography to opportunities for solitude is therefore minimal.
- VEGETATIVE SCREENING: The main vegetative form in the Designated Natural Area is the Bristlecone Pine.

While these trees provide some screening, their density is not sufficient to provide outstanding opportunities for solitude, given mulitple users.

- 5. ABILITY OF USER TO AVOID OTHERS: Because of the extremely small size of the Designated Natural Area, and because of the limited screening provided by topography and vegetation, it is unlikely that one user would be able to avoid contact with other users.
- 6. CONCLUSION: The Heusser Mountain Bristlecone Pine Natural Area does not possess outstanding opportunities for solitude. Most damaging to solitude opportunities is the extremely small size of the Designated Natural Area. The configuration also detracts from such opportunities, and the topography has a limiting effect on overall opportunities. Only the vegetative screening afforded by the Bristlecone Pines contributes anything to solitude opportunities, and this screening is insufficient to provide outstanding opportunities. The total effect of all of these factors is to provide less than outstanding opportunities for solitude.
- 7. SUMMARY: Does the Designated Natural Area have outstanding opportunities for solitude?

_____ Yes __X No

B. PRIMITIVE AND UNCONFINED RECREATION

- 1. DIVERSITY OF RECREATION: The diversity of recreational opportunities in the Designated Natural Area is severely lacking. Nature study is the only practical primitive and unconfined recreation available to the user. Camping is virtually impossible because of the steep angle and rockiness of the terrain. Horseback riding would be very difficult because of the terrain. Hiking and hunting opportunities may be present, but because of the conditions described below, these opportunities are limited.
- QUALITY OF RECREATION OPPORTUNITIES: The quality of nature study is not high, simply because there is nothing unusual or outstanding about the wildlife and vegetation present in the area. Hiking and hunting opportunities may be present in the Designated Natural Area, but their quality is so low as to render them insignificant. Hiking opportunities would be very limited by the extremely small size of the Designated

Natural Area, and hunting would be hampered by the small size of the area and the difficulty of access for hunting and removal of game.

- CONCLUSION: Opportunities for recreation of a primitive and unconfined nature are poor in the Designated Natural Area, both in diversity and in quality. The scarcity of recreation opportunities is due mainly to the remoteness, ruggedness, and small size of the area.
- SUMMARY: Does the area have outstanding opportunities for a primitive and unconfined type of recreation?

Yes X No

IV. SUPPLEMENTAL VALUES

The Designated Natural Area possesses no known supplemental values. The natural designation of the area was given on February 4, 1965, to set aside a typical stand of Bristlecone Pines. Because of their relatively wide spread nature, the pines cannot be considered a supplemental value.

SUMMARY: Does the area contain ecological, geological, or other features of scientific, educational, scenic, or historical value?

.____ Yes _X No

V. POSSIBILITY OF CERTAIN AREAS RETURNING TO A NATURAL CONDITION

Because the entire 480 acres of the Designated Natural Area are in a natural condition, a consideration of the possibility of certain areas returning to a natural condition is unnecessary.

WILDERNESS INTENSIVE INVENTORY SIGNATURE SHEET

		NV-040-048A (DNA)	
Name:	Heusser Mount	ain Bristlecone Pine Natural A	rea
	Field Inventory (Wh Size Analysis	o conducted analysis and when)	12/10/79
	Naturalness	In house toute	12/10/79
	Solitude	A Wallie Havle	12/10/79
	Recreation	In home force	12/10/79
	Supplemental Values	1. Jaine House	12/10/29
	Rehabilitation	Signature House	12/10/79 Date
II.	Review	1	, ,
	District Wilderness	Specialist	, ,
	Larry P. Jung Name	Signature Signature	/2/10/19 Date
	Resource Area Manag	er	
	Richard T. Watts Name	Richard V. Watter	<u>/2-/0-79</u> Date

WILDERNESS INTENSIVE INVENTORY

HEUSSER MOUNTAIN

NV-040-048A

Ely District Ely, Nevada

WILDERNESS INVENTORY WILDERNESS SUMMARY SHEET

Ι.	LOCATION	
	Inventory Unit No.: NV-040-048A	
	Area/Island Name: Heusser Mountain	
	District: Ely State: Nevada	
II.	SUMMARY	
	Results of wilderness characteristics analysis.	
	1. Does the area or island appear to be natural? X YesN	lo
	Does the area or island offer outstanding opportunities for solitude or a primitive and unconfined type recreation? Yes X N	lo
	3. Does the area meet any of the size requirements? X Yes X	lo
	4. Does the area or island have supplemental values? $$\underline{X}$$ Yes $$\underline{N}$$	ło
III.	RECOMMENDATION	
	Area or island should be approved as a WSA.	
	X Area or island does not qualify for wilderness study.	
	A portion of the area (s) or island (s) should be approved as a WSA for further study and reported to the President. The restrictions imposed by Section 603 will no longer apply (reference to map) on the remainder of the area.	ι
ΙV.	APPROVAL A District Manageria	
	A. District Manager:	
	Date: 50/36/80/	
	B. State Director: Through I Spang)	
	NOV 1 4 1980	

AMENDMENT

The size of the unnatural portion of subunit NV-040-048B is 1140 acres rather than "about 1100 acres". This change results from more exact mathematical computation.

WILDERNESS INTENSIVE INVENTORY

- I. SPECIAL: Two special circumstances pertain to this area. First, the area contains the Heusser Mountain - Bristlecone Pine Natural Research Area. This area was designated to set aside a 480 acre stand of Bristlecone Pine for educational purposes. Second, consideration was given to a mammade influence outside of the review area, the Kennecott Copper Smelter at McGill. On occasion, an inversion will cause the review area to be inundated with smog from the smelter. Since this external activity has a direct impact on the area user, consideration was given to the smelter's proximity.
- II. SIZE: The size of the Heusser Mountain review area was originally 53,200 acres. As a result of the initial inventory, subareas NV-040-048AA through 048AE were dropped as being obviously and clearly unnatural. Their acreage totaled 20,100 acres, leaving 33,100 acres to be intensively inventoried.

A small section of private, undeveloped (and totaling 160 acres) exists in the northern end of the review area. SUMMARY: Does the review area have at least 5000 acres of contiguous land? X Yes No

III. NATURALNESS: Most of the major imprints of man's work in the review area were eliminated during the initial inventory. A few such imprints were left in the area to be intensively inventoried, and a new natural portion boundary has been drawn to also eliminate these. In the southern end, two routes have been eliminated; a route protruding into two subarea from the eastern boundary road, near Losetti Ranch, has been eliminated; and several routes protruding in from the boundary road in the northern end have been called out. The basis for the elimination of each of these intrusions is that each renders the area in which it is found highly unnatural. The natural portion which remains after these intrusions are discounted is approximately 24,600 acres. There are no known imprints of man's work within this natural portion.

Found within the review area, high on the western slopes of the Egan Range, is the Heusser Mountain Bristlecone Pine Designated Natural Area. This 480 acre area was made a Designated Natural Area on February 4, 1965. A separate intensive inventory report has been written for the Designated Natural Area, as required by Congress.

This portion of the review area which is natural and has been left in for intensive inventory is almost entirely mountainous. The area is comprised of a steep section of the Egan Range which runs north and south, and whose highest point is Heusser Mountain, at 9,411 feet. Some grazing takes place on the lower elevations and a patented mine exists in the northeast corner of the intensive inventory area.

SUMMARY: Does the area appear to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable? X Yes* No

^{*} a portion

IV. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR PRIMITIVE AND UNCONFINED RECREATION ANALYSIS

A. SOLITUDE

- SIZE: The 24,400 acre size of the natural portion of the review area is not innordinately large. Such an acreage would, by itself, perhaps present fair opportunities for solitude.
- 2. CONFIGURATION: The review area is long and narrow, running approximately north and south. Its length is about 16 miles, and its width varies from 1 to 5 miles, and averages perhaps 2 to 3 miles. Such a configuration somewhat limits the opportunities for solitude in that multiple users would be forced to stay within a narrow strip. Travel within the area would necessarily be mostly in a north south direction, and multiple users would likely pass within sight of one another while using the area.
- 3. TOPOGRAPHIC SCREENING: The topography of the area is almost entirely mountainous. The mountains are a single, steep ridgeline which provides little screening within the area, except that users on one side of the ridge cannot see others on the opposite side. The steep and talus nature of the slopes insures that most travel within the area will be along the ridgeline, restricting the route of travel to an even narrower path.
- 4. VEGETATIVE SCREENING: Much of the area is covered by pinyon pine and juniper. Also in abundance are limber pine, white fir, curlleaf mountain mahogany, and bristlecone pine. Generally these trees occur in a moderate to thick density and provide instances of quite good screening. However, the area which would most often be travelled by users, the ridgeline, is almost completely barren of vegetation. Vegetative screening of any practical use is very limited and is certainly not outstanding.
- 5. ABILITY OF USER TO AVOID OTHERS: The configuration and topography of the area require that users restrict their travel to the single ridgeline, whose topographic and vegetative screening are minimal, and where the incidence of one user encountering others would be very high. The combined effect of all features of the area is to produce poor opportunities for one user to avoid others.
- CONCLUSION: The combined effect of the configuration, topography, and vegetation of the natural portion of the review area is to be produce limited opportunities for solitude.
- SUMMARY: Does the review area have outstanding opportunities for solitude? Yes X No

B. PRIMITIVE AND UNCONFINED RECREATION

- 1. DIVERSITY OF RECREATION: Several types of recreation are possible in the review area. Prairie Falcons, Bristlecone Pine and other more commen species of plants and animals present opportunities for nature study. Hunting, hiking, dry camping, back packing and photography are also possible, as is rock scrambling. While this is a good diversity of opportunities, it is not outstanding.
- 2. QUALITY OF RECREATION: The quality of nature study is affected by several factors. The accessibility of the area is the greatest of these. Access is extremely arduous, particularly to the Designated Natural Area. Also, the Bristlecone Pine is not particularly rare and is found in several other sites within the district. Viewing of the Paririe Falcon is difficult because of the dense vegetation and rocky topography of its nesting environment. Nature study is therefore not outstanding. Hunting would be hampered by the difficulty of shooting through tree cover and by the difficulty of leaving the area with game. Hiking would be very difficult because of the steep talus slopes, the only exception being along the single ridgeline. Camping is a possible recreation, but is not outstanding because of the small number of good campsites and the need to carry in water over very rugged terrain. Backpacking would likewise be hindered by the challenges to endurance and balance posed by the rugged terrain. Only photography is of better than mediocre quality; and it too would be hindered by the difficult trek into the area.

The quality of all recreation opportunities is further affected by the McGill smelter, east across Steptoe Valley. At times, atmospheric inversions trap the pollutants given off by the smelter, causing a thick layer of smoke to hang over Steptoe Valley and the eastern portion of the review area. Such conditions seriously affect the enjoyment of any primitive form of recreation possible in the review area.

- 3. CONCLUSION: The very difficult terrain of the area is one of the main limiting factors of opportunities for primitive and unconfined recreation. The diversity of recreation, although good, is less than outstanding; and none of those recreational opportunities that do exist are of an outstanding quality.
- 4. SUMMARY: Does the area have outstanding opportunities for a primitive and unconfined type of recreation? ____Yes _X_No

V. SUPPLEMENTAL VALUES

There are no known supplemental values in the area.

VI. POSSIBILITY OF CERTAIN AREAS RETURNING TO A NATURAL CONDITION

Very few of the imprints of man's work remain in the portion of the review area to be intensively inventoried, and all of the few that do remain could not be expected to return to a natural condition in either a reasonable amount of time by natural means or by a reasonable amount of hand labor.

WILDERNESS INTENSIVE INVENTORY SIGNATURE SHEET

Inventory Unit # NV-040-048A Name Heusser Mountain	
I. Field Inventory (Who Conducted Analysis and When)	
Size Analysis <u>Jack Simonson</u>	August 1979
Naturalness Candace Ojala / / /	May 1979
Solitude Jamph Mulyle Hours	1/21/80
Recreation Lary Marke tours	1/21/80
Supplemental Values Of Works Halve	1/21/40
Rehabilitation Wayle Howle	1/2//40
II. Review	
District Wilderness Specialist	
Larry P. Jung	1/21/80
Name Signature	Date
Resource Area Manager	
Richart T. Watts Achieved Whatte Name Signature	Ju. 22, 1980 Date

WILDERNESS INVENTORY SITUATION EVALUATION

	IDENTIFICATION

Area/Isla	nd Name	(if	available): _	Heusser	Mountain	
Inventory Unit No.:		NV-040-048A				
				•		
State	Neva	da	I	District _	Ely	

II. UNIT ANALYSIS

Describe the following applicable factors in a concise narrative; use additional sheets if necessary; supplement with photographs.

- A. Ownership Approximately 1500, acres of land are in private ownership. The rest of the area is in Federal ownership.
- B. Size of unit or number and size estimates of multiple units The review unit is approximately 48,000 acres in size.
- C. Easements There are no known easements
- D. Leases 0il and gas leases are scattered throughout the area. They cover approximately 25% of the review area.
- E. Mining claims Approximately 2,600 acres are claimed for mining purposes.

 These are primarily located in the southeastern portion of the unit.
- F. Permanent improvements A well and unreviewed road occur on the public land. Private land also contains some improvements.
- G. Existing uses The area is being used for ranching and mining.
- H. Human activity Activity in the area is from ranches, mines, hunting and collecting (primarily firewood, pinenuts, fenceposts, and christmas trees).
- Land treatment/manipulations A seeding in the east.
- J. General vegetation and topographic features General vegetation is mostly pinyon-juniper and sagebrush with some bristlecone pine, bunchgrass, saltgrass, greasewood, mountain mahogany and shadscale. Topographic features are mountains with foothills and benchland along the perimeter and some flatland in the southern and eastern perimeters.
- K. Contiguous lands N/A

III. UNIT EVALUATION

- A. Select one of the following:
 - The area appears to have potential for further wilderness consideration.
 - The area obviously and clearly does not have potential for wilderness.

Explain your rationale for selection. Portions of the area appear to be in a natural condition and over 5,000 acres. The topographic and vegetative screening provide some opportunities for solitude. This review area contains a natural area (Heusser Mountain) and, therefore, is an instant Study Area.

- 3. Is area or island of sufficient size? Yes
- C. Is there enough public support for intensive wilderness inventory of the area or island or any part? No support has been expressed
- IV. UNIT RECOMMENDATION (Check appropriate block.)
- Area or island (or groupings) is recommended for intensive wilderness inventory.
 - B. Area or island (or groupings) is recommended as not qualifying for further inventory and should be dropped from the wilderness review process.

STAFF SIGNATURE	Feb. 26, 1979
0	DATE
AREA MANAGER	£6. 26,1979
AREA MANAGER	DATE

V. APPROVAL

VI. AMENDMENTS

- A. The northern boundary and total acreage were in error in the initial inventory. The revised total acreage is 53,200 acres.
- B. Public comments indicated that while the core of the unit is natural, the perimeter is heavily intruded with roads, mines, buildings, dumps and gravel pits. A field review of the area revealed a heavily intruded perimeter, with access routes too close to map on a half inch scale. Buildings, fences, wells, mines, pipelines, a reservoir and gravel pits. Several portions of the boundary were intruded to the point of being obviously not wilderness (NV-040-048AA, 048AB, 048AC, 048AD, 048AE). The remaining area, NV-040-048A, is generally natural and will be carried through the intensive inventory.
- C. The revised acreages are:

NV-040-048A	33,100	public	80	private	
NV-040-048AA	4,000	public	0	private	
NV-040-048AB	5,000	public	0	private	
NV-040-048AC	3,600	public	0	private	
NV-040-048AD	6,700	public	240	private	
NV-040-048AE	800	public	0	private	_
TOTAL	53,200	public	320	private	

VII. UNIT RECOMMENDATION

	Area is recommended for intensive wilderness inventory
	Area is recommended as not qualifying for further inventory and should be dropped from the Wilderness rereview process.
X	A portion(s) is recommended as not qualifying for further inventory and should be dropped from the wilderness review process.
STAFI	SIGNATURE & S/O/79 DATE
4.0	Pined A Natton globe

VIII. APPROVED - AS AMENDED

AREA MANAGER

Hel me Clery

8/27/79 DATE PUBLIC COMMENT

+ 27,6 Burney Four Marines mount Itali Office FO KNI 12006 Remo IV 89520 Dentho, Demail like to comment on the areas you are revewing for welders as - Consideration I have spent sly wish - doing a geologies fild study on BLM land in nevada as well his their numerous tryes though the state in oder to enjoy the magnificant over space I have exportented solitude is many places including the fletares found one allural forial in the valleys between the mountained & am distressed that some of these first oreca were omitted because they lock an opportunity for solitule Beruse of the size of these areas they do provide solute & Freent their museon for this reason. Latingly support all of the wilderness study area in your current inventory. In addition of ungeyou to include the following alea in the inventory, Hoshute anyon 1040-015:18 Egan Beach 040-019 30 Newser mountain 040-048 A Martin Jerung 040-123

SOARD OF

Joseph Pancolas 040-153

Jouth Pancolas 040-155

20 outhing ton Mountains 040-242

Planden Valley Baseron 040-243

Piorth Baselle 060-132

Fondays 060-170

Junto Buston 060-172

Batas Mountain 060-192

Junes Park 060-428

Parth Fish Crark 060-428

Parth Fish Crark 060-482

Dismond Mountains 060-054

Math Dismond 060-054

List to I can be informed at to you deadons regulary Jacob shas as your planning process proceed of surprise for including these areas in your wildenses recommendations of grands.

0861 8 JUL 3 VENCE ALALE OFFICE AGAVEN. NEVADA.

BUL OF LEND OFFICE

Thank you for you; consider ton of my concerne. Leak Mr. Fortain_

for Fortaine BOX1/92 Star Rte Thachapila 93561

Hi farry Comments on intensive inventory on Ely District. By LARRY MONROE Ycommend the BLM for proposing the following areas as WSA's and think they should defentely be statustically protected by congressing will will all will be statusted. eld Willdriess arely. Vishate Canyon (040-CIS / Parite Syring 640-686) 1 rack Range (840-1521), Perendan & Well (640-166), 'Table Mountain (040-197) EW bill peace Range (040-202) Weepah Spring (040246). In addition, I strongly ungethe Binto no see and WSA'A. Moshite Conyon (040-0156) this scene and prenules outstanding solitude and highling. Egan Basin, (040-119) This ages with Lugged topegraphy and dense vigetilise commissionalis outstanding solitude and beling. area with good regeliture and topographic screening provides outstanding opportunities for solitude D Heusser Mountain (040048A) The area hasenough varied terrography and denie regetation to (5) Muten Journ (040-123) These rugged since mountains provide outstanding solitical Jolitiale, hockpacking and - Kelling

2727

015

Licit Pancakins (646-153) they seeme mountain ous area with cliente. mentioned Jouth Fancakes (0 40-155) This rugged and I with runningly carryonly providly varied tegropoly and their outstanding foliable along dutile catitanding buckpacking and bileny. Westhington Mandetsens (040-242), The dense regetation (ponderosa and britteegne sine and sheer rock cliffs sound outstanding solitude, and line packering and bulling Outstanding feelunts-(Lunder Velley Reservoir (040-243) The dramatic disestine mountains provides quied topography and outstimiling solitude Jarry Monroe

939 E 500 S. SALT LAKE, UTAH 84102

720 Brookfield Drive Reno, Nevada 89503 -June 19, 1980

Pirector, Bureau of Land Management Nevada State Office F. G. Box 12000 Reno. NV 89520

Dear Sir:

Since I came to Nevada twenty-one years ago, I have been very interested in the BLM lands, and I was pleased and excited when the provisions of the Federal Land Management and Policy Act of 197c meant that BLM roadless lands would be studied for wilderness values and possibly be included in the National Wilderness System. Nevada is indeed fortunate to have such lands still in a natural condition.

In general I believe that the BLM wilderness staff in the six districts and on the state level did a good job of picking WSA's, although there are serious omissions in all of the districts. If course, I realize the magnitude of the task with so many millions of acres of land to study in such a short time. May I take this apportunity to comment on the cooperation and helpfulness of the wilderness staff in dealing with the public. They are to be congratulated for their patience, hard work, and perseverance in the face of opposition.

My attached comments on specific areas are divided according to districts, and each area is identified specifically by name and number.

Thank you for the opportunity to make my input into this important process. Please send me your final list when it is released.

Sincerely,

Marjorie Sill

ELY DISTRICT (040)

All of the BLM recommendations for WSA's seem to me to be excellent Choices. These include: 015 - Goshute Canyon, 086 - Granite Spring, 154 - Park Range, 166 - Riordan's Well, 197 - Table Mountain, 202 - White Rock Range; and 246 - Weepah Spring.

However, many outstanding areas were omitted because it was claimed they lacked solitude or primitive recreation opportunities. Certainly, this is nonsense when it refers to 242 - Worthington Mountains, which is one of the finest caves in the United States and contains magnificent Leviathan Cave--goal of many spelunkers.Other areas which should have been recommended as WSA's include:015B - Goshute Canyon, 019 - Egan Basin, 021 - Butte Mountains, 048A - Heusser Mountain (including Bristlecone Pine Natural Area), 123 - Martin Spring, Mountain sub-unit), and 243 - Garden Valley Reservoir.

LAS VEGAS DISTRICT (050)

I am not personally familiar with any of the areas in the Las Vegas District, but I understand from close friends of mine who know and lave the wilderness that all of the BLM recommendations for WSA are very valid. The only additions they would make to the list are Silver Peak Range North and 0406. - Lost Cabin Spring. Evidently the wilderness staff in Las Vegas did an excellent job in assessing wilderness values.

EATTLE MOUNTAIN DISTRICT (060)

Ten important areas have been recommended for WSA status in this district. These include: 019 - Kawich, 059 - Rawhide Mountain, 112 - South Reveille, 142 - Palisade Mesa, 158 - Blue Eagle, 163 - The Wall, 166 - Grant Range, 191 - Morey, 231 - Antelope, and 541 - Roberts. I have spent a little time hiking in the last three (not as much as I want to, however) and consider them spectacular wilderness with magnificent opportunities for both solitude and primitive recreation.

However, nine equally important areas have been omitted from the MSA list because of subjective judgments as to what constitutes "outstanding" solitude or recreational opportunities. These are: 132 - North Reveille, 190 - Fandango, 192 - Slanted Buttes, 407 - Bates Mountain, 428 - Simpson Park, 461 - South Fish Creek, 482 - North Tish Creek, 504 - Diamond Mountains, and 554 - North Diamond To outside the original subject of the consistion of the Diamond Mountains is particularly difficult to understand since this is an area which is extraordinarily scenic, provides great hiking and backpacking, and seems to qualify in every way. Neither a "single narrow ridgeline" nor the presence of very primitive roads outside the roadless area should disqualify this area. The discrepancy between the lukewarm description of the unit in the book and the actual unit itself is noticeable.

elt.

Ruth C. Douglas 3451 Silverado Trail North St. Helena, Calif. 94574

June 22 1/50

Bureau of Land Management, Nevada State Office P.O.Box I2000 Reno,Nevada 89520

Dear Sir:

Enclosed you will find listed -with a few personal comments -all of the Wilderness Study Areas proposed jointly by BLM and conservationists as well as the additional areas proposed by conservationists and a few areas that I myself propose to add to your agenda.

Everyone of these areas offers naturalness -where there are traces of human passage these traces are such that within a short time under wilderness protection they will disappear. Everyone of the areas listed offer either an outstanding opportunity for solitude OR an outstanding opportunity for a primitive and unconfined type of re-creation.Or in a great many cases combine BOTH of these criteria.

I hope that you will timerefore see fit to add conservationists' listed areas to your own WSAs as -in my judgement they are equally worthy of Wilderness Study and eventually and hopefully wilderness classification on a permanent basis.

However generous wilderness study and designation may hopefully be decided on by your Office the fact will remain that the areas turned over to non-wilderness use will be immensely greater in acreage.So I do not think that MAXIMUM wilderness classification is at all unreasonable nor would it appear so to any objective observer of Nevada .However as I know the State rather well I am also very aware that there is no objectivity in Nevada as far as wilderness is concerned. The great majority of Nevadans are still living in the early XIXth century and regard wilderness as an enemy to be raped, laid waste, conquered, plundered and exploited down to the last blade of grass, the last drop of water... the only reason it is OUT THERE is to in some way or other be gobbled up.Consumed.And worst of all -they dor even have the prudeht housekeeper attitude of setting aside some largesse for tomorrow.No.It must all be consumed RIGHT NOW. If future generations are confronted with the Nevada as Sahara Desert (and not just the casinos of that name) then -too bad. No doubt by then they will be able to fly away to Mars -or some other planet.

رنو. إنها have sometimes thought that I would like to design a bumper sticker with the following words imprinted on it:

HELP SAVE WILDERNESS LEAVE SOMETHING FOR THE NEXT GENERATION TO DESTROY.

Perhaps the Nevadans(and all who ressemble them all over the US and especially in the Sagebrush Rebellion States))would not even understand what this bumper sticker was trying to say!

So you see that I am perfectly aware of what you are up against trying to save the wilderness of Nevada. You have a few friends in the State - thank God-but you mostly have enemies.

It will take one hell of a lot of guts to stand firm and go ahead and do what is right for wilderness in Nevada for the wildlife that depends on this wilderness to survive and for future Nevadans who - if they could have their say -might want to inherit something better than that which is planned for them by present day Nevadans.

I will not close this letter without a few words about what wilderness and Nevada mean to me.

Quite simply wilderness -in Nevada or elsewhere - is as near to me as the

blood that runs in my own veins. Although I cannot spend all the time I would like to spend in wilderness it is always in the background of my mind. It is out there somewhere ,and the knowledge that it is there, still vast stretches of it, unharmed as yet, untrammeled, lonely, a great non-human piece of this ever more crowded and polluted planet -that knowlege, that background music to my everyday life so to speak, is some thing that I may not be able to live without.

I am growing old and have sometimes thought that -whatever occurs -I will not live to see the end of wilderness in my own country. Will not live to see the end of Nevada, of Utah, of New Mexico, of Wyoming, of Colorado, of Arizona -and the other great parts of the West. Sut of late I am not so sure. If I dont die soon, it may still go before

I do! All sorts of horrors seem to be going om and I do not use the word horror lightly.

The MX Basing. I've been fighting that for the past six months and am still fighting. The MX would mean the end of Nevado And it would probabaly mean the end of Nevadans too if it were built and war came... if ever provocation existed the MX would be it andwould draw down total destruction.

I still hope -perhaps I am an optimist after all -that we can stop the $\ensuremath{\mathsf{MX}}$.

But mining ? Develope-ment ?Overgrazing ?Overpopulation ?Destructive ORVS everywhere ?

I dont know. I hope that we can save at least off that which is listed on the enclosed pages. And more.

I count on conservationists such as do exist in Revada and elsewhere to do their utmost for Nevada wilderness. And I also count on the BIM. Especially you people who are in the field the people who work in Nevada.

I dont feel so good about the big shots in Washington. But maybe you can persuade them -instead of them having the last official word.

There are moments -this is one of them-when I wish I did have some power to DO something. As it is I can only send in a plea -and assure you that it is

As it is I can only send in a plea -and assure you that it is writen from my heart, out of a deep and passionate and lifelong commitment to wilderness and wild life and wilderness values.

And no wilderness has ever been more dear -and few are now as dear to me-as the wilderness of Nevada.

I dont go to Yosemite any longer and not often to the beautiful Sierras of California. Too many people.

But Nevada still offers immensities of solitude and the feeling of being almost infinitely separated from any other human than the one or at the most two people who are with me We are for once alone -or seem to be alone -on the planet.

And this experience in this world of ever shrinking space and tarnished landscapes is perhaps the greatest thing that I can now experience on this earth.

I thank BLM for making this possible.But PLEASE continue to make it possible.

Dont give up.And dont give away any wilderness -not any of it.

Many thanks for listening. Sood luck And If I can help if help is within my means you may sount on me for what I can do.

sincerely and cordially yours

Ruth C. Douglas

Mountain area.

Areas proposed by Conservationists (continued)

Heusser Mountain (040-048A) Extremely steep abrupt mountains rising over 9,000 ft. The Bristlecone Pine Natural Area -a designated area -is in here and should make this area a MUST for WSA.

Martin Spring(040=(040=123), 'Mountains here rise above the tendthousged ft mark. More-of- of the limstone formations in cliffs Pure water with trout there are mountain lion(in this area.

West Pancakes (040-I53) Broad subunit -Moody Peak dominates a jumbled topography. Very fine P-J forest.

South Pancakes- (040-155) Portuguese Mountain, over nine thousand ft. Ruaged diversified subunit. Many interesting intermountain canyons.

<u>Morthington Mountains</u> (040-242) Jagged rockfaces surmounfed with ponderosa and higher up, bristlecone. Leviathan Cave in this area.

Garden Valley Reservoir (040-243) Colden Cate Range subunit. Impressive lime stone desert type mountains. Should be preserved and they cannot remain so if not under wilderness.

The following areas are proposed by myself as additions to above

Big Springs Wash	(040-184)	These two	units show	ıld be
under consideration	as WSAS as t	they are	contiguous	to the Sou	th End of
Lexington Creek	(040- 185	5)	Mount Whe	eeler which	ı is undêr

consideration as a Wilderness Area by the U.S.Forest Service
They would provide a buffer for the Wheeler area and have authentic
wilderness character of their own in keeping with the beautiful Wheeler

June 24, 1980

Edward Spang, Director Nevada State Office Bureau of Land Management P. O. Box 12000 Reno, Nevada 89520

Re: Ely: District Proposed Wilderness Study Areas

Director Spang,

We are writing to support the WSA proposals of the Ely District of the BLM. Further, we have identified nine (9) additional areas the reviewers left out for reasons which we believe are inconsistent with BLM guidelines.

The Ely District contains some truly outstanding lands. Many of these were inventoried as roadless and are now being considered for WSA status. The general features and nature of the land including topography, geology, wildlife habitat, aquatic habitat, climate history, extent of tree and brush cover, life zones present, and many others are of critical importance in assessing wilderness characteristics.

The BLM is assessing these characteristics and deciding whether or not an area is natural in appearance and possesses either outstanding opportunities for solitude or primitive recreation. The citizens, to whom the land belongs, are then to comment on the job the BLM did making these assessments. Since it is unlikely even residents of the ELY district are sufficiently familiar with each area to assess wilderness characteristics, the yellow book is of critical importance for most of us to assess the area as well as the job the BLM reviewers did.

Unfortunately, the descriptions provided of the many areas are terse to the point that very important features are not described. People who have visited an area or who, like many of us, are exceptionally familiar with the wide diversity present in Nevada, recognize the oversimplification of the vegetative cover and topographic features being "described". In fact, the presence of wildlife species, springs, meadows, streams, riparian areas, different life zones, snow fields, and cliff or rock outcroppings is not noted most times. Missing frequently are also the names and elevation of mountain peaks, names of endangered species found, and reference to outstanding scenic or geologic formations—such as caves.

An example of what we are writing about is the description given of Martin Spring (NV-040-123):

"AREA DESCRIPTION: The unit covers a mountainous portion of the south end of the Egan Range. Primary vegetative types are pinyon-juniper and sagebrush." This is an inadequate description. How mountainous? What other vegetation is present? Any streams? Meadows? Riparian Areas? What is the Area High point? Name? What are the elevation differences? Wildlife present?

In fact, this description really tells a reader nothing about this area. It leaves out the following important details: The elevation exceeds 10,000 feet. It is a rugged, heavily wooded, limestone mountain area. It is not the "south end" of the Egan range as described. There are streams for fiching, wildlife for hunting and photographing, rugged terrain for hiking and sightseeing, and it is adjacent to another BLM WSA just south. All these pieces of information BLM's assessment.

Cince no attempt is made to have a summary generally available of the "inventory" files found in state and district offices, only the local residents have the opportunity to "explore" the logic employed by the staff in evaluating the "solitude or recreation criteria" used extensively to eliminate natural areas. Therefore, the descriptions appearing in the yellow book should be of high quality so that all interested parties have the information to comment intelligently. We are concerned that the poor descriptions in the yellow book, especially in the Ely District, will bias the comments since no information is available to people who can not go and inspect the lengthy wilderness files.

We are basing our comments on trips to eastern Nevada, discussions with others who have visited the district, maps and even the yellow book (however inadequate). Following are each of the areas we support as WSA's:

Goshute Canyon (040-015 and 040-015B). Both of these sub-units (32,000 acres and 55,900 acres respectively) inventoried originally as one unit are interesting mountain and foothill land with a wide variety of eastern Nevada vegetative life-zones represented. Within the area is the Goshute Canyon Natural Area and the home of an endangered fish species. Clearly, no case is made that the 15B subunit lacks solitude in 55,000 acres of land. The area possesses outstanding opportunities for solitude because of its size alone. In addition with must be included as a WSA along with the smaller 015 which the BLM proposed. The northern Cherry Creeks are more accessible to a wider variety of people and offer good opportunities for wildlife viewing and enjoying the sense of space which the Great Basin possesses. The higher portion of the unit provides to the visitor a dramatic range of vegetative

cover. High peaks are covered with fir and bristlecone pine with excellent riparian zones in the canyons. Lower pinyon pine forests offer "seclusion with a view" to the hiker. A pinyon forest is very enjoyable hiking since it offers shade and screening without closing one in. Here, too, archaeological sites provide excellent recreation as does the opportunity to explore the interesting geology.

Egan Basin (040-019). This small but rugged mountain area has some of the best vegetative screening in Nevada. It is completely covered with a forest ranging from the dense pinyonjumiper foothills to mountain mahogany and fir further up to the 9000 foot plus summit. Such a forest, while not unique, is obviously of high quality in Nevada with few continuously forested areas. Excellent opportunities exist to climb and explore this area. Hiking and horseback riding are just a few of the recreational pursuits. This combined with exploring the old historic sites offers outstanding opportunities for recreation.

Butte Mountains (040-021 and -021A). These two areas comprise roughly two-thirds of the Butte Mountain range and contain two peaks above 9000 feet. Vegetative and topographic features offer open views to outside the area as well as interior views of canyons. In its evaluation of the recreation opportunities of the area found. In the Yellow Book, the BLM refused to identify any type of recreation possible in the area. However, because of its elevation and butte summits, the area offers good to excellent ski touring and winter mountaineering. In addition, the area has scenic qualities which the BLM has not mentioned. Exposed and jutting rocks on and around the buttes with forested areas and canyon riparian zones are outstanding scenic qualities. Both units

★ Heusser Mountain (040-048A). This part of the Egan Range is a high, steep mountain area. The BLM arguments that "travel along the ridge line affords little solitude" and that there is the "occurrence of heavy smog from the McGill smelter" are absurd. The opportunity for solitude is all that is required, not continuous solitude over every acre while traveling or stopped. Also, the presence of "sights and sounds" from outside the area must not be considered in the evaluation. It is obvious that the BLM thought the Bristlecone pine an outstanding natural resource since it designated a Natural area (480 acres) here. We find that this is also an outstanding recreational value for observing, photographing and painting. The case the BLM attempts to make here is very weak. It seems to violate the rules the BLM was supposed to use to evaluate areas. There is ample opportunity for solitude in canyons and tree covered areas as well as excellent

p. 7: Ghiglieri and Strickland

The foregoing comments are necessarily a summary of our feelings about these outstanding areas in the Ely District, although perhaps more complete than most of the descriptions presented in BLM's yellow book. We trust that you will consider our comments in your final recommendations for WSA status for these outstanding areas.

Sincerely,

Rose Strickland



June 30, 1980

Mr. Dave Harmond, Wilderness Coordinator Bureau of Land Management P.O. Box 12000 Reno, NV 89520

Dear Dave:

The Nevada Cattlemen's Association opposes the classification of the following areas for wilderness study:

Elko District

- 1. Bluebell (010-027) Lacks naturalness do to fences, roads and corrals in the area.
- 2. Goshute Peak (010-033) Lacks naturalness and outstanding characteristics necessary for wilderness.
- 3. Devils Corral (010-103A) This unit also contains range improvements that take away from the naturalness of the area.
- 4. Owyhee Canyon (010-106) This unit lacks quality necessary for a true wilderness experience as was intended by Congress.
- 5. Little Humboldt River (010-132) This area lacks quality for wilderness.
- 6. Bad Lands (010-184) Area lacks outstanding quality for wilderness.

We support the BLM's decision not to include the following areas in wilderness study:

Spruce Mtns. (010-016); Spruce Ridge (010-017); Sugarloaf (010-049); White Sage Flat (010-060); Cortez (010-070); Little Owyhee (010-102); Hat Peak (010-104); Silver Lake (010-109 & 109A); Winter Creek (010-111); Rock Creek (010-130); Rough Hills (010-151); Cottonwood-Salmon Falls (010-179); and Hanks Creek (010-197).



THE RESIDENCE

June 30, 1980

- 7. Montone Mine (030-432) This unit is not large enough to be considered for wilderness. Considering this unit with a U.S. Forest Service proposal, in order to make a 5,000 acro or larger parcel, is not a reasonable procedure. The unit should be evaluated on its own merits in order to meet the wilderness criteria.
- 8. Slinkard (030-531) This unit is too narrow to provide adequate solicude. Sights and sounds of man's existance would be evident. Thus, this unit doesn't meet wilderness criteria.
- 9. Carson-Iceberg (030-532) This unit doesn't meet the criteria for size when considered on its own. Other uses would very likely be restricted because of wilderness classification if so classified.

Other units in the Carson District that we support the BLM's recommendations on, and will submit our objections for further wilderness study on are: Shoshone Mcdows (030-106); Agusta Mtns (130-108); Wassuk Range (030-323); Lyon Peak (030-520); East Pine Nuts (030-525); Burbank Canyons (030-525-A); Virginia Mtns (030-605), and Petersen Mtn. (030-610).

These units do not meet the criteria for Wilderness.

Ely District

-

- 1. Coshute Canyon (040-015). This unit doesn't meet the criteria for Naturalness. A road'exists in , and leads to, a steel building located on private property within this unit. Solitude within the unit could be broken by visible and audible occurances out of the unit due to the physical layout of the unit.
- Granite Spring (040-086). This unit lacks quality necessary for Wilderness. Flat characteristics covered by low lying vegetation definately do not meet the qualities of wilderness intended by congress.
- 3. Park Range (040-154). This unit lacks characteristics necessary to provide quality wilderness.
- 4. Riordan's Well (040-166). This unit doesn't offer scenery of high enough quality necessary for wilderness classification.
- 5. Table Mtn. (040-197). This unit doesn't provide quality wilderness characteristics. This land could be put to another use more benefical to the public. $\,$
- 6. White Rock Range (040-202). Quality for wilderness is lacking in this unit. Other uses exist that would benefit the public more than wilderness.
 - 7. Reepah Spring (040-246). Wilderness quality is poor in this unit.

We support the BLM decision $% \left(1\right) =\left(1\right) +\left(1\right)$

Goshute Canyon (040-015-B); Egan Basin (040-019); Butte Mtns (040-021s 021 A); Heasser Mtn. (040-048-A); Martin Spring (040-123); West Pancakes (040-153); South Pancakes (040-155); Worthington Mtns (040-242);

and Garden Valley Reservior (040-243).

These units all lack wilderness quality and fail to meet other criteria necessary for wilderness .

las Vegas District

- 1. East Pahranaget (050-0131). This unit lacks quality, on its σ_{WH} merit, to be considered for Wilderness.
- 2. Medsger Pass (050-0154). This unit lacks wilderness quality. The low shrub vegetation offers little screening and leaves little chance for solitude when considered by itself.
- Lower Pahranagat Lake (050-0165). This unit doesn't meet the criteria for size or solitude. It also lacks wilderness quality.
- 4. South Pahrocs (050-0132). Wilderness quality is lacking in this unit. Those qualities one associates with wilderness do not exist .
- 5. Pigeon Spring (050-0350). This unit doesn't meet the criteria for size or solitude.
- Queer Mtn. (050-0354). The topography and low vegetation of this unit doesn't provide for quality wilderness.
- Ronnie Claire Plat (050-0355). This unit doesn't have outstanding wilderness quality. Classifying, it as wilderness would not allow for its best use.
- 8. Porter Mine. (050-0368). The size of this unit doesn't allow for opportunities of outstanding solitude. Outstanding wilderness quality doesn't exist in this unit.
- 9. Amargosa (050-0369). This unit should be considered on its own marits for wilderness. It doesn't meet the criteria for wilderness in that it isn't outstanding.
 - 10. Nothing Flats (050-0370). Quality is lacking in this unit.
- 11. Gem (050-03R-22). This unit doesn't meet the criteria for size and lacks outstanding quality for wilderness. Significant opportunity for solitude doesn't exist because of the small size of this unit.
- 12. Resting Springs Range (050-0460)& 0460 A). This unit doesn't meet the criteria for size if cosidered alone. Opportunity for solitude doesn't exist in this unit especially when considered on its contaminant.
- Mount Stirling (050-0401). This unit, and its sub units, lack outstanding qualities associated with wilderness.

BLM INTENSIVE WILDERNESS INVENTORY

COMMENTS BY NEVADA CONSERVATION ORGANIZATIONS

BLM	District	t Ely			
Uni	t_Name ar	nd Number	Heusser Mountain	040-48A	
1.	Size:				

- a. BLM unit (and subunits).
 - 32,940 acres
- Location and area of land conservationists believe has wilderness characteristics.

25,000 acres

- 2. Roadlessness: All unreviewed routes have been aliminated, including several ways. We object most strongly to the cherry stemming of unreviewed routes, since these, in turn are used to disquality units which otherwise might have qualified for WSA status. Many of the unreviewed ways in the Heusser mountain appear to be ways, expecially at the upper ends.
- Naturalness: The unit as drawn is essentially natural. Some parts of it appear not to even have been grazed.
- 4. Outstanding opportunities for:
 - a. Solitude. Although the unit is a single ridgeline, the opportunities for solitude are indeed outstanding. The vegetative cover is excellent with several varieties of conifers. The 9415 foot Heusser Mountain exemplifies the high rough terrain. Many of the unreviewed routes are ways and should not be used to to argue for lack of solitude.
 - b. Recreation: This unit is particularly suitable for short excursions into the wilderness. Being near a populated center, the recreational opportunities for those folks living near are excellent. The several varieties of trees, including pinyons, juniper, limber pine, white fir, mahogany and bristlecone pine provide strong scenic resources. The west side is particularly scenic. The Bristlecone Natural area additionally offers the opportunity to explore that ecoaystem type.

The intensive inventory report suggests that the McGill smoot interferes with the recreational experience. Inversions will keep the smoot well below the ridgeline and in fact will provide good reason to escape the smoot to the high mountain terrain around Heusser.

 Recommendation: Conservationists recommend that Heusser Mountain be added to the WSA catagory. The unreviewed routes should be either classified roads or ways.



June 30, 1980

Bureau of Land Management Nevada State Office P.O. Box 12000 Reno, Nevada 89520

Dear BLM:

The Colorado Council of Trout Unlimited strongly supports your recommendations for Wilderness areas in Nevada and urges the inclusion of many other worthy and fully qualified areas in the Federal Wilderness System. Following are those we especially commend for protection of their unique and outstandingly remarkable values:

HLHU DISTRICT

Devil's Corrall (010-103-A) write Canvon (010-106) Little Humboldt River (010-132) had Lands (010-184) Little Owyhee (010-102) Arck Creek (010-130) Rough Hills (010-151) Cattonwood-Salmon Falls (010-179) Bank's Creek (010-197)

CARSON CITY DISTRICT

when Alpine Mountains (030-102) :linkard (030-531) . Wassuk Ronge (030-323) Lyon Peak (030-520)

WINNEMUCCA DISTRICT

Blue Lakes (020-600) North Black Rock Range (020-622) McGee Mountain (020-637) North Fork Little Humboldt (020-827) Tobin Range (020-406)

ELY DISTRICT

Goshute Canyon (040-015) Heusser Mountain (040-048-A) Martin Spring (040-123)

BATTLE MIN. DISTRICT

Eawich (060-019) blue Eagle (060-158/199) Baces Mountain (060-407) North Fish Creek (060-482)

Most of the above listed areas include important water resources that are both rare and vital in the arid Nevada lands. Their protection should be a prime goal of wilderness designation not just for the fish species involved but for the rare and unique ecosystems they support. Many more areas, of course, are eminently worthy of wilderness protection for values other than water and we urge your recommendation of all those which truly qualify. Unissturbed lands have many unseen values for mankind. Nevada's largely underappreciated landscape is easily damaged and deserves special care.

Novada Wool Growers Association

Nevada State BLM Office Proposed Wildemess Areas P. O. Box 12000 Reno, Nevada 89520

Dear Sirs:

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We understand 015B, 019, 021, 021A, 048A, 123, 153, 155, 242, and 243 have been recommended by some groups to be put back in for wilderness study areas.

Our association wishes to reaffirm our stand that we agree with the BIM study of April, 1980 of proposed wilderness study areas and that these above areas not be recommended for wilderness study areas.

We do not believe that these areas qualify or meet the minimum standards for wilderness areas.

Sincerely,

June 27, 1980

Gracian 7. 71, 1alde Gracian W. Uhalde President

Sen # 2:

ect

Tel.: (702) 786-8801

noranda

April 22, 1980

B.L.M. Intensive Wilderness Inventory P.O. Box 12000 Reno, Nevada 89520

Gentlemen:

Noranda Exploration, Inc., a mineral exploration company, has an inherent concern in the federally managed lands in Nevada. Of particular concern to Noranda are those areas which are under review by the Bureau of Land Management as Wilderness Study Areas.

In several of these areas, Noranda personnel have conducted both ground and air reconnaissance work in order to make fair, accurate, and responsible comments as to the potential of these areas as W.S.A.'s. Particular attention was made to those features (i.e., roads, mines, pits, mine dumps, corrals, etc.) which appear to be substantially noticeable.

There appear to be definite and noticeable imprints of man's work and permanent impacts within all of the wilderness study areas which were surveyed by Noranda. It is our contention that even though a number of these intrusions may be considered as individual intrusions, the overall aggregate of these intrusions qualify as a "cumulative impact" as set forth in Chapter 1, B-4 of the Interim Management Policy Act.

There exists within the Ely district several areas surveyed by Noranda with another type of "man-made intrusion" that is a real and valid "impact" which should also be considered. These areas (040-242A, 040-235A, 040-243, 040-247A, and 040-246) are within the boundaries of an existing military operations area (M.O.A.). While surveying within these areas low flying military aircraft could be almost continuously observed flying at altitudes of only a few hundred feet above the terrain. This type of impact can be considered a valid impact, especially when one is thinking in terms of "opportunities for solitude" and seclusion from the "imprints of man's work."

The following pages contain photographs taken by Noranda personnel which document many of the types of intrusions which

Cont'd.

April 22, 1980 Page 2

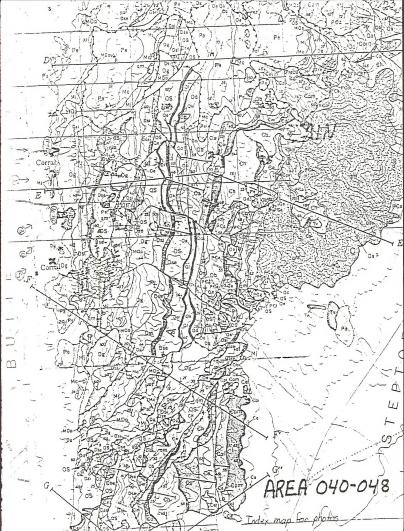
exist within these areas. Due to the time allowed and the logistics involved, not all of the intrusions actually present are documented. Further surveying would without a doubt turn up many more intrusions and add to our supposition that due to the cumulative impact of these intrusions, these areas do not satisfy the "non-impairment criteria" set forth for wilderness status.

We appreciate your careful consideration of our comments and welcome any "feedback" or discussion that you may have for these areas.

cruty yours,

Larry L. Lackey
District Geofogist

Encl. LLL:kac



119 madon

June 7, 1980

Mr. Edward Spang Staté Director Bureau of Land Management USO F.O. Box 12000 Beno, Nevada 89520

Dear Mr. Spang:

Here are some comments, supplementary to those on the forms the Bureau supplied, on the Nevada intensive inventory. Although the BLM, in the yellow document, requested that comments, to be useful, should refer to specific land units, I do think that "overall" comments are in order as well. There are several reasons for this belief: one, in the Nevada political context, you will still receive quite a few comments opposing any and all MSA recommendations and questioning the Bureau's legitimacy, competence, and good faith; two, I think it is valid and constructive for citizens to endorse a "package" of MSA's in addition to making their own unit-specific suggestions; and three, the Bureau's methods may be questionable, resulting in the biased inclusion or exclusion of areas. I'll discuss each of these points below.

Comments against wilderness (or, on the other hand, uncritically for the study of all intensively-inventoried areas) generally, are not supposed to have an effect on the ultimate selection of WSA's. I agree, and I think the Eureau's intention to let only objective evidence change its recommendations is good, but there will no doubt be pressure from many quarters to minimize the number and size of final WSA's. Most of these objections will be based on an interpretation of the on-the-ground intrusions the Eureau wants to know about, but a lot of them will arise from dislike of wilderness in general. As an indication, according to the "Surmary of Analysis of Public Comments..." on the initial inventory, 15% of the public respondents made general comments. Judging from page 2 of that summary, the majority were anti-wilderness. The comments this time are going to be at least as numerous and emphatic.

Therefore, an advocate of conservation in Nevada feels compelled to support the Bureau at each step of the wilderness review, to point out the general benefits of wilderness (in this case, wilderness study), and to endorse a list of areas drawn up in some systematic fashion, even if he or she does not have direct knowledge of every area. There is always.some "vote-taking" even in a technical process like this, and wilderness advocates know that they must be counted when the process itself is at issue.

The Lahontan Audubon Society and allied groups have drawn up a lat of desired WSA's including BIM recommendations and about an equal number of nonselected areas. Besides concurring with your basic recommendations, the proponents of the list studied the available

Mr. Edward Spang June 7, 1980 p. 2

information, consulted with district and state coordinators, and in some instances visited the areas. I support their proposal because it is, at base, supportive of the Bureau and its section 003 mandate, because it is necessary, in Nevada, to have a firm, documented position to which people and groups can subscribe, and because the additional areas they seek seem desirable and reasonable additions to the final list of WSA's.

Although it is a required part of the wilderness review, study is quite valuable in itself. Many aspects of the wild Nevada landscape are not well known, as the MX planners are finding out for eastern Nevada. One may question whether "naturalness" and the other orimary characteristics can be conclusively determined for all lands in the year devoted to the initial and intensive inventories, but that is an academic objection at this point. Supplemental values, which could be some interests' main motivation for supporting wilderness, are something else. It often takes quite a bit of time to develop new information about cultural, biological, and geological/geomorphological features and, to the extent we don't have the information, wilderness study and interim management provide the means to learn a lot more. For that reason, I would support WSA status and the coordinated, multimisciplinary studies it entails for much of the land as possible, especially where supplemental features exist but haven't been analyzed or even discovered.

As an aside, I would like to point out that the fieldwork accomplished to date by the inventory crews is -or could be - quite valuable as an overriew on the existence and condition of developments on the public lands. The information and map updates should benefit other programs such as renge and fire management (e.g. existence and passability of routes) and, I think, it's time the Bureau took stock of all that's been done to the public lands over the years, the wilderness mandate notwithstanding. Such a stock-taking is the first requirement for making decisions on how much more alteration we want to allow or is necessary to conduct the economy of the state.

There are efforts underway to discover, map, and analyze the significant natural features and areas of the state, partly so that systematic protection efforts have a sound basis. I refer not just to what the Eureau is doing, say with cultural resource management, but to "heritage" efforts supervised by the Nevada Division of State Parks and to the National Natural Landmarks program. The Heritage Conservation and Recreation Service is currently working with ten potential Landmarks in Nevada, most of which are on public land and at least three of which (e.g. McCullough Range) are recommended WSA's or WSA's from accelerated inventories. Obviously the Eureau has a particular responsibility when "heritage" resources are involved, and the more land that is studied and afforded interim protection, the better is a systematic inventory of Newad's special features served.

Mr. Edward Spang June 7, 1980 p. 3

I said at the outset that the Burean's methods may have been questionable. I didn't mean this in general, as I know that personnel have been working under time pressure, over great distances, and with difficult criteria. Stevever, I object to the way in which some criteria have been applied, and will point out a few examples. It's interesting to note, with Nevada in mind, that solitude, in combination with adequate size, roadlessness, and naturalness, is enough to warrant WSA status. The application of the solitude criterion has been about the most strongly argued aspect of the review methodology, and I'd like to comment on that in particular.

First, as with "...recreation", the wilderness surveyor is making conjectures when he evaluates solitude, because nobody is amound to actually met if the area affords solitude under a wilderness designation. So, the surveyor makes a theoretical evaluation based on the "key factors" listed on page 17 of the yellow book. Under actual conditions with, say, several parties recreating in an area at the same time, their behavior and equipment may have as much to do with their impact on each others' experience as the topography and vegetation, but the BIM can't evaluate the former.

In contrast, size, roadlessness, and naturalness are qualities that aren't theoretical, but can be evaluated on the basis of information on file, field survers, air photo interpretation, and maps. These qualities don't represent "what if.." situations, but present conditions, and I don't disagree with the Bureau's determinations of them.

I think, based on personal experience, that many intensively-inventoried units are so remote and inhospitable to the kind of backcountry recreation most people are accustomed to that the factors listed on p. 17 would be largely irrelevant to solitude. Unit Olo-2h2, for example, is to be dropped because opportunities for solitude are "severely limit(ed)", yet one can question whether there will ever be enough people recreating there for all the theoretical objections raised in the solitude analysis to be realised. In short, for the Worthington Mtms. as for other units disqualified on the solitude criterion, the Eureau is projecting an unrealistic degree of crowding for such remote, dry, vast, and often . rugged areas.

Users' behavior influences other people's solitude a lot. A forthcoming guidebook to Great Basin wild areas (which will describe the BLM wilderness review and many intensively-inventoried areas) is going to suggest some practices for users that will enhance solitude if applied: wearing colors and using equipment that blend in with the country; off-season exploration; doing some dry-camping as well as camping at vater sources; and leaving as little sign of one's presence as possible.

Mr. Edward Spang June 7, 1980 p. k

Solitude is a matter of degree, and it depends on users' behavior, time of year (it might be tough to find during deer season), and the number and manner of encounters. A party in the Pancake Range, an open area, would be surprised to see another group, but they wouldn't necessarily feel that their solitude had been impaired nor that they roulin't stay out of each others' way. In contrast to forested and/or humid numnainous wilderness areas, there is so little liberature on what people seek and experience in the wild desert that some borderline cases of impaired solitude or "unconfined...recreation" ought to be resolved through Wilderness Study or even some basic research.

Other borderline cases are those in which all the primary criteria except the two theoretical ones (solitude and "primitive and unconfined type of recreation") are unquestionably met, but these two are controversial and there are conceded high supplemental values. I think that such areas (e.g. Worthington Mtms.) should be given the benefit of the doubt and recommended as WSA's. Leviathan Care is of both recreational and supplemental value, yet it's controversial and the detailed Intensive Inventory writeup does not resolve this. In fact, it goes on to say that under the RIS rating the mountains are "excellent for primitive values", in some contradiction to the wilderness evaluation.

Interim management is based on a lengthy, authoritative body of regulations that were adopted after long discussion, presumably cover all situations, and are in force now. They are a protection "tool" for supplemental and other values and as such of considerable importance until the ACEC guidelines are finalized and we know what other administrative sesignations the Sureau can and will apply to areas not recommended as Wilderness to Congress. The ACEC category may well be a fallback, as larry Jung informally suggested to me, for some nonselected areas, but this remains to be seen. Meanwhile, I urge that controversial units, or portions of them, be given WSA status so that, among other things, the supplemental features have protection until the role of alternative designations becomes clear. According to the Washington office, the ACEC guidelines will be out this fall, after you would have made final decisions on WSA's.

Thank you for considering my comments. I think that the "yellow book" reflects a fine job of summarizing the findings and explaining what the Bureau wants from the public. Good the review.

Sincerely, Nicholas Van Pelt Nick Van Pelt

WILDERNESS, BLM P.O. Box 12000 -300 Booth St., Rm. 3008 Reno. NV 89520

ELT

Mick Van Pelt
Box S45 N. Park

Tucson AZ 857/9
Lensing any Group 700-

BLM District Ely

Unit Number NV-040-048A

(Use one sheet for each unit)

Unit Name Heusser Mtn

For	BLM	Coding	Use	Only:	
I			s		_
In_			Out_		NA/NI
Α			0		

we purpose of our wilderness inventory, wilderness characteristics as office and outlined by Congress are:

dlessness:

ne word 'roadless' refers to a essence of roads which have an improved and maintained by innanical means to insure relately regular and continuous a. A way maintained solely

 A way maintained solely the passage of vehicles does constitute a road."

...generally appears to have an affected primarily by mees of nature with the print of man's work subantially unnoticeable." 2) Size:

 a) 5,000 acres or more of public land.
 b) Less than 5,000 acres but are of unique character and are of sufficient size suitable for wilderness management.

 Are contiguous to other federally managed acreage determined to have wilderness values.

 Solitude or a Primitive and Unconfined Type of Recreation:

 ...has outstanding opportunities for solitude or a primitive and unconfined type of recreation.

:u think this area has wilderness characteristics? -Yes 🕱 No[]

m wmy not? Using the back of this sheet, please be specific and address the nee or absence of the characteristics outlined above. If you need to point out sicular location, please do so on a map. BLM wilderness maps are available notific land areas in the state. To make sure your map comment is able to be seed, please mark your comment clearly with a heavy black pen; in writing nearby size your comment (e.g. "maintained, regularly used road" or "well" etc.) and be to put your name and address on the map. Please do not use colored pens as colors are not reproducible on Xerox or duplicating machines.

SIZE: Ample

ROADS: The top of the ridge, and the steep

Mountainsides, are naturally roadless. The

Maps show many routes cherrystemming

along the margins of the unit, but most of

those are ways at their upper ends. The

terrain repels travel beyond them, as does the

Vegetation in a lot of places - mahageny etc. NATURALNESS: The yellow book says 24,400 acres are wentrely natural" -- I'd agree about the part The seen south of the natural Area. The area around Hensser Mtn. itself is particularly striking remote-seeming, and even pristine. That upper best or basin drained by uppermost Rattlesnake Canyon has probably never been grazed. I wish that the Bineau would commission an ecologist to take a look at that area if it's a relict. there's a supplemental value, in contradiction to SLM's language. And the west side of Heusser Mitn. is scenic as hell! is scenic as hell!
SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION: Solitude is fine if one disagrees with the Bureau's interpretation of narrow configurations as unacceptable. Unlikely a visitor would run into any one else up there. Recreation very fine too. Short-dwater trips would be attractive say going from the appearance or from the excavations just north of Hercules Gap. The smelter plume very rarely touches Heusser Mtn. - I chsagree that it matters. And, from a good part of the unit, one can't even see me fill

ridge

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